

Dicken Crane  
Holiday Brook Farm  
100 Holiday Cottage Rd, Dalton, MA 01226

12 August 2010

Phil Giudice  
Commissioner  
Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

Subject: Comments on DOER Biomass RPS Rulemaking Process

Dear Commissioner Giudice,

As a farmer and forest landowner with land in various forms of conservation the future of biomass energy is very important to me. From the inception of the Patrick administration with the combining of Energy and Environment into a single agency (EOEEA) I have hoped that a synergy would be found that would benefit both. I've come to realize that unintended consequence rendered this wishful thinking. Nonetheless, the maintenance of our agricultural and forest land base hangs in the balance of this Rulemaking Process. It is important to note that most of the land that has the capacity to impact greenhouse gas emissions in this state are privately owned. These rules will influence the decisions of landowners and effect the future agricultural and forest land base and its capacity to sequester carbon . The reliance on the Manomet Study to determine the carbon out put of biomass energy does not take into account the emissions of the feed stocks even if they are not used. The determination of minimum efficiency standards must recognize that not utilizing these feed stocks has an efficiency of 0.

While for over a century the recovery of forests from abandoned agricultural land has created a landscape in Massachusetts of over 60% woodlands. The recent reversal of this trend is the result of the permanent conversion of woodland to development from which there is little hope it will have another chance. The global availability of forest products and the lack of local markets for low grade wood have led to the degradation of both the forest and the future of forest landowners. The biomass market could improve both while significantly reducing the state's net carbon emissions. Although this is not clearly stated in the Manomet Study it is not because it is not possible but

Dicken Crane

Holiday Brook Farm

100 Holiday Cottage Rd, Dalton, MA 01226

because the scope of the study did not take into account the life cycle emissions of declining forests, forest residues and waste wood. It also did not take into account the loss of private forestland through conversion. Opportunities to improve the volume and value of all the states forestland while reducing the 0% efficiency emissions of waste wood and residues most not be ignored in this rule making process. This is especially important in light of the trend toward the conversion of private forestland to development, a process that greatly and permanently increases emissions. Secretary Bowles letter directs you to propose regulations to align with *“our better understanding of greenhouse gas implication of bio energy”*. The Manomet Study does not truly represent a complete understanding. Many of the recommendations in letter run counter to the goal of reducing emissions. The Secretary’s suggestion that limiting *“15 percent by weight of total saw timber removed per acre as eligible to be treated as forest residues for biomass fuel”* is misguided. This will have the negative effect of encouraging landowners to cut what should be left to grow, the saw timber, and leave the low grade in its place. The Manomet Study does not account for the increased use of durable forest products in place of plastic, steel and concrete which all have much higher carbon footprints than wood. Determining the sustainability of the fuel source across the diverse conditions of the forested landscape will require a much more thorough understanding of the impacts of soil moisture and aspect on decomposition rates and soil type, species composition and management on growth rates. A set of guide lines that could be updated as more is learned about the forest’s response as well as the landowner’s to the biomass market, would be more appropriate than regulations based on unverified suppositions. Any changes to CH 132 must bear in mind that the goal is to incentives the private forest land owner to maintain the land in forest as well as protect the range of forest values. Costly requirements will have the opposite effect. Their input most be sought in this process.

The definitions of “waste wood” and “forest residues” must make clear that “whole tree chips” can be produced from either. The reality that whole tree chips do not by definition require the whole tree to be chipped or even cut must be made clear.

While it is Secretary Bowles’ goal to reduce green house gas emissions to reduce the impacts of the climate crisis, DOER must not forget that we face

Dicken Crane

Holiday Brook Farm

100 Holiday Cottage Rd, Dalton, MA 01226

another formidable crisis as we slide down the back side of peak oil. The easily available fossil fuels and other natural resources from around the globe will become increasingly expensive as they are depleted and the developing world demands their fair share. We must do all we can now to prepare for the energy crisis we will soon face. To allow policies and regulation based on a partial understanding of the very complex carbon cycle reduce our future energy security will be a mistake. We can leave our forests in their relatively unproductive state, leaking CO<sub>2</sub> into the atmosphere as they continue to decline and be converted or recognize their potential to help sustain us when the rest of the world won't. Let us not lead this state, so famous for award winning innovations, to a Darwin Award because we were in a big hurry and got it wrong

Sincerely

Dicken Crane